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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Met Carnahan, Governor • David A. Stott, Director

OFFICE OF THE DIRECTOR

P.O. Box 176 Jefferson City, MO 65102-0176

MAY 2 1 1997

Letter
From: DNR
to: Representative
Howerton

MAY 16 1997

The Honorable Jim Howerton
State Representative 120th District
State Capitol, Room 105E
Jefferson City, MO 65101

Dear Representative Howerton:

Thank you for your recent letter expressing interest in redevelopment of the Martha Rose Chemical site in Holden. You requested that the Department of Natural Resources (DNR) carefully review the cleanup of this site to determine whether continued testing is necessary.

My staff has been fully involved in all aspects of this site since the problem with hazardous substances was first discovered. Although the Environmental Protection Agency (EPA) is the lead agency, DNR actively participated in all decisions and oversaw the cleanup. Also, my staff is fully aware of the issue you brought up in your letter.

As you know, the Martha Rose Chemical site was among the most highly contaminated sites in Missouri. Although the site was not officially placed on EPA's National Priorities List (NPL) of Superfund sites, EPA and DNR considered the site so severely contaminated that it warranted a cleanup that followed the same procedures as an actual NPL site.

The cleanup decision which EPA signed for the site called for excavation and removal of contaminated soils. It did not call for a groundwater cleanup, despite the fact that groundwater beneath the site contains high levels of hazardous substances. Instead, EPA's decision (which was made available for a 30 day public comment period before being signed by EPA) called for groundwater monitoring for a minimum of ten years following cleanup of the soils.

After the cleanup of soils was completed, the parties responsible for the contamination approached EPA and DNR to request that they be relieved of their requirement to monitor groundwater at the site for the minimum ten year period. This request was made despite the fact that no cleanup of groundwater was conducted and that hazardous substances remain in groundwater. The parties stated that the site no longer presents a risk and that cessation of monitoring is essential to allow redevelopment of the site.

DNR has carefully reviewed the situation. DNR's Hazardous Waste Program (HWP), which manages this site for the state, has consulted with the Division of Geology and Land Survey (DGLS), as well as the Missouri Department of Health (DOH), regarding this request. In

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summary, all of these agencies oppose any cessation of groundwater monitoring. Volatile organic compounds and other hazardous substances remain at high levels in groundwater beneath the site. Although DNR does not believe that groundwater cleanup is necessary at this time, we believe that monitoring of the contamination is a minimal effort necessary for the protection of human health and the environment. Also, such monitoring is a component of EPA's signed cleanup decision, which was made available for public review and comment.

It should be noted that my staff has offered to reduce the scope of the required monitoring, but the PRPs have never indicated any interest in such a reduction.

DNR is very sensitive to Holden's desire to redevelop this property and supports and encourages their efforts. We see no reason why the former Martha Rose Chemical property cannot be reused, as long as the contamination in the groundwater is monitored. Monitoring can continue while a new enterprise utilizes the site.

Thank you once again for your interest in this site. I trust that this letter adequately explains DNR's position on this issue. If I may be of further assistance in this matter, please do not hesitate to contact me at (573) 751-4732.

Very truly yours,

DEPARTMENT OF NATURAL RESOURCES


David A. Shorr
Director

DAS:ssr

c: Mr. Steve Kinser, EPA
Mr. Daryl Roberts, DOH